



Great Plains Communications
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ROBOCALL MITIGATION PROGRAM

Great Plains Communications LLC (“GPC”) submits this Robocall Mitigation Program (“**RMP**”) and report, on behalf of itself and its related subsidiaries¹, pursuant to 47 C.F.R. § 64.6305. This RMP describes GPC’s framework to mitigate illegal robocalls, including the status of GPC’s implementation of STIR/SHAKEN call authentication. GPC adopted this revised RMP as of February 26, 2026². GPC deems the policies and procedures contained in this RMP to be reasonable steps to mitigate illegal robocalls. GPC may modify, add, delete, or otherwise alter any part of this RMP in order to respond to changes in its business, technologies, and any lawful requirements.

STIR/SHAKEN Implementation; Extension

As indicated in the FCC’s Robocall Mitigation Database, GPC has implemented the STIR/SHAKEN authentication framework on the IP portions of its network and calls it originates on that portion of its network are compliant with 47 C.F.R. 64.6301(a)(1) and (2). In addition, GPC has established the policies and procedures set forth in this RMP which are intended to stop anyone from using GPC’s service to originate illegal robocalls.

For those portions of its network that are not capable of STIR/SHAKEN (i.e., TDM / non-IP technology that cannot initiate, maintain, carry, process, and terminate SIP calls), GPC relies on the continuing extension provided under 47 C.F.R. § 64.6304(d).

Traceback Requests and Notices of Suspected Illegal Traffic

GPC will fully and timely (within 24 hours of receipt) respond to all traceback requests from the FCC, civil and criminal law enforcement, and the registered industry traceback consortium. GPC will cooperate with such entities in investigating and stopping any illegal robocallers that use GPC’s voice services to originate, carry, or process illegal robocalls. GPC will dedicate sufficient resources to respond to all traceback requests. GPC will include in any future carrier interconnection and/or service agreements language requiring traceback cooperation on any voice service calls exchanged. See [Appendix B](#) for the single point of contact for all traceback requests.

Upon receipt of a Notification of Suspected Illegal Traffic from the Enforcement Bureau, GPC will promptly investigate the identified traffic and report the results of its investigation to the Enforcement Bureau, and if appropriate, block or cease accepting identified traffic and substantially similar traffic as required by any such Notification. GPC will also provide the required certifications related to any such Notification.

Subscriber Due Diligence

GPC conducts routine reviews of all new and renewing subscribers to confirm the identity of the subscriber (i.e., “know your customer”), including noting the service address, billing address, contact information, nature of the subscriber’s business, and other relevant business information (as applicable).

¹ GPC has several subsidiaries that participate in this RMP. See list of participating entities in Appendix A. Any reference to GPC in this RMP shall also be deemed to refer to each participating subsidiary, as may be applicable.

² Previous revisions to this RMP include 6/30/2021, 6/28/2023, and 2/25/2024.

GPC will retain call detail records to determine typical call volumes, and GPC will contact subscribers if it detects any patterns that indicate any suspicious call behavior.

Terms & Conditions; Acceptable Use Policy

As a condition to service, subscribers are subject to enforceable terms of service, including an Acceptable Use Policy, that prohibits subscribers from using their voice service to originate illegal robocalls. In the event of unlawful use of the service, GPC will take appropriate action to remediate the situation, including initiating a traceback investigation, verifying subscriber's usage, issuing a warning to the subscriber, suspending the subscriber's service, terminating the subscriber's service, and notifying law enforcement, as such measures may be deemed appropriate.

Know Your Upstream Provider

As a rural provider of voice services, the number of upstream providers used by GPC to receive and deliver its originated voice calls for termination are limited. GPC has longstanding relationships with its upstream providers and maintains its awareness of the nature of their businesses and the legitimacy of their call transmission services. Further, GPC is committed to taking those steps necessary to ensure that any upstream providers providing connectivity are equally committed to monitoring their networks and preventing their use for the transmission of illegal robocalls. This includes the use of robocall prevention or other contractual language that only allows for lawful use of services in any contracts that GPC may have directly with any upstream provider entities. See Appendix B for a list of GPC's current immediate "Upstream Provider(s)."

Traffic Analytics

GPC uses software-based analytic tools to monitor voice traffic on its network in real-time to identify suspected unlawful activity. The software provides detailed reporting based on suspicious traffic, including bursts of high call volumes, low durations, low completion percentages, low reputation scores, and sequential dialing patterns, repeated calls made to do-not-call registry or invalid numbers, and other similar patterns. See Appendix B for the name of the vendor that GPC uses along with the description of the analytic tools used to identify and mitigate illegal robocall traffic.

Other Considerations

In addition to implementation of the STIR/SHAKEN framework, GPC is continuously evaluating the voice marketplace for solutions to provide the best voice service to our customers. GPC may offer certain incoming robocall mitigation services (e.g., call blocking) to our customers. We look forward to supporting the FCC's objectives of combating unwanted robocalls.

Contact Information

For more information regarding this RMP, or to initiate a traceback request, please contact GPC at robocall@gpcom.com or 1-888-343-8014.

APPENDIX A
Operating Entities Covered by RMP³

Company	FRN	OCN
Great Plains Communications LLC	0004381380	1577
Great Plains Broadband LLC	0015340417	012E
Great Plains Communications Long Distance LLC	0006973200	
InterCarrier Networks LLC	0020057980	
Sunman Telecommunications LLC	0002901833	0825
Miles Communications LLC	0002884963	4857
Sunman Telecommunications Long Distance LLC	0007642952	

Information about Principals, Affiliates, Subsidiaries, and Parent Companies

Ownership structure: All Operating Entities listed above are owned, directly or indirectly, by Great Plains Communications LLC, which in turn is owned by Great Plains Communications Holdings LLC. Grain Communications Opportunity Fund II, L.P. (“GCOF II”) is the indirect majority equity partner of Great Plains Communications Holdings LLC. GCOF II is an investment vehicle managed by Grain Management LLC (“Grain”). See the companies’ most recent Section 214 Applications and related Ownership Disclosures on file with the FCC for further information about GPC’s ownership structure.

Management structure: GPC is managed by a Board of Managers consisting of company executives, representatives from Grain, and independent directors. The Board of Managers has appointed executive officers to manage day-to-day operations and act on behalf of the company. GPC’s Executive Leadership Team can be found on the company’s website, www.gpcom.com. Members of GPC’s Board of Managers and Executive Leadership Team may change from time to time.

Please contact GPC if further information is required.

³ This RMP is intended to cover any GPC subsidiary that acts as a voice service provider, now or in the future (e.g., future acquired subsidiaries).

APPENDIX B

Traceback Request Single Point of Contact:

Name: Brian Riebow

Title: Sr Manager of Voice Networks

Phone: 402-456-6594 or 888-343-8014

Email: robocall@gpcom.com

Upstream Providers:

- Alta Fiber aka Cincinnati Bell
- American Broadband
- AT&T LD
- AT&T Mobility
- Bandwidth
- Frontier
- Global Crossing
- Inteliquent, IQ/Sinch
- Level 3
- Lumen
- MCI
- Ninestar
- Qwest
- Toly
- Verizon Wireless
- Viaero Wireless
- Wiltel
- Windstream

Contact GPC if further information is required about any of GPC's Upstream Providers.

Call Analytics Vendor Name and Description of System:

Vendor: TransNexus

Tool: Clear IP <https://transnexus.com/clearip/>

Description of Tool: Call analytics purchased from the vendor determine if originating calls should be blocked. If the telephone number appears on a Do-Not-Call list or otherwise is an unallocated, unused, or invalid number, the call will be determined to be fraudulent and needs to be blocked. Vendor may also use advanced fraud detection which enables behavior analysis and tracking of abnormal and unexpected calling patterns to detect high volume robocalling, spoofing, and suspicious call activity.